

# **EXHIBIT A**

**RUDOLPH & KAYAL**

COUNSELORS AT LAW, P.A.



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*(Please reply to Manasquan)*

\* Also admitted in NY

+ Also admitted in PA

~ Also admitted in FL

March 23, 2021

Direct e-mail: [malmeida@rudolphkayal.com](mailto:malmeida@rudolphkayal.com)

Cruser, Mitchell, Novitz, Sanchez, Gaston & Zimet, LLP  
Douglas V. Sanchez, Esq.  
Mack Cali Corporate Center  
50 Tice Boulevard, Suite 250  
Woodcliff Lake, NJ 07677

RE: Crincoli v. GEICO  
Docket No: 2:20-cv-3380 (SDW)(LDW)  
Our File: 60219

Dear Mr. Sanchez:

Please accept this correspondence in lieu of a more formal demand for discovery pursuant to the court's recent pretrial scheduling order.

Kindly provide responses to New Jersey Superior Court Form C and C-1 Interrogatories.

Kindly provide the following documents:

All documents identifying or referencing any operators and vehicles (including the vehicle make, model, and description; registered owner; and registration information) operating on the Lyft platform within ½ mile of the intersection of Marin Blvd. and 6<sup>th</sup> Street/Thomas Gangemi Drive in Jersey City, NJ on July 7, 2018 between 1:30 and 3:00 a.m.

All communications between defendant and any operators and/or vehicles operating on the Lyft platform within ½ mile of the intersection of Marin Blvd. and 6<sup>th</sup> Street/Thomas Gangemi Drive in Jersey City, NJ on July 7, 2018 between 1:30 and 3:00 a.m.

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All “forward dispatch” data, reports, summaries or other similar documentation created, stored or maintained in relation to any operators and/or vehicles operating on the Lyft platform within ½ mile of the intersection of Marin Blvd. and 6<sup>th</sup> Street/Thomas Gangemi Drive in Jersey City, NJ on July 7, 2018 between 1:30 and 3:00 a.m.

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A copy of policies and procedures concerning tracking of drivers operating on the Lyft platform.

Very truly yours,

MANUEL J. ALMEIDA JR., ESQ.

MJA/cjk

Encl.

cc: Susi K. Yanez, Esq.  
Diane Cardoso, Esq.

# **EXHIBIT B**



Douglas V. Sanchez, Esq. (DS1565)  
**CRUSER, MITCHELL, NOVITZ, SANCHEZ, GASTON & ZIMET, LLP**  
Mack Cali Corporate Center  
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Woodcliff Lake, New Jersey 07677  
201-474-7100  
Attorneys for Defendant,  
Lyft, Inc.

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

ANTONIO CRINCOLI,

Plaintiff(s),

vs.

GEICO INSURANCE COMPANY, LYFT,  
INC., UBER TECHNOLOGIES, INC.,  
RASIER LLC, RASIER CA LLC, RASIER DC  
LLC, JOHN/JANE DOE (fictitiously named  
unknown driver/owner), JOHN DOE 1-10  
(fictitiously named), and ABC Co. 1-10  
(fictitiously named),

Defendant(s).

CIVIL ACTION NO:  
2:20-cv-03380-SDW-LDW

CIVIL ACTION

**DEFENDANT LYFT INC.'S RESPONSES  
TO GEICO'S NOTICE TO PRODUCE**

**TO: Manuel J. Almeida, Jr.**  
**RUDOLPH & KAYAL**  
**2317 Highway 34, Suite 2-C**  
**Manasquan, NJ 08736**  
**Attorneys for Defendant, Geico Insurance Company**

Defendant, Lyft, Inc., (hereinafter "Defendant"), hereby responds to Defendant, Geico  
Insurance Company's Notice to Produce as follows:

**GENERAL OBJECTIONS**

1. To the extent that Defendant responds to Defendant Geico Insurance Company's  
Notice to Produce Document Demands, the response does not necessarily imply that the

information provided is relevant to this case, and such response is not to be construed as waiving any objection stated herein.

2. Certain requests call for information relating to contentions or allegations as to legal or factual issues in this matter. Inasmuch as discovery in this action is in its preliminary stages, Defendant reserves the right to alter or amend the substance of any such contentions as the action progresses and as warranted by discovery.

3. Defendant objects to the requests to the extent they call for information not in Defendant's possession, custody, or control, or seek information already in Defendant's possession, or the possession of third parties, or that is otherwise available to Defendant, or is a matter of public record.

4. Defendant objects to the requests insofar as they purport to require Defendant to provide information and/or documentation that is subject to the attorney-client privilege, the attorney work-product doctrine, the self-critical analysis privilege, the joint defense privilege, or any other privilege or immunity. By providing any information or producing any documents in response to Defendant Geico Insurance Company's Notice to Produce, Defendant has not waived the right to assert any privileges.

5. Defendant objects to Defendant Geico Insurance Company's Notice to Produce requests to the extent they are not limited in scope to a relevant time period.

6. Defendant objects to the requests to the extent they seek information that was generated, obtained or received by Defendant during or in anticipation of this lawsuit.

7. Defendant reserves its right to challenge the competence, relevance, materiality, and admissibility at trial or any related proceeding, of this or any other action, of any information, or documents provided in responses to Defendant Geico Insurance Company's Notice to Produce.

Defendant expressly reserves its right to rely on all facts, information and documents developed in discovery or otherwise in support of its claims in this matter.

8. Defendant objects to the requests insofar as they purport to require Defendant to provide information or documentation that is subject to a protective order, confidentiality order, non-disclosure or confidentiality agreement.

9. Defendant objects to the requests, including, if any, the definitions and instructions, to the extent they seek to impose duties beyond those imposed by the relevant Court Rules.

10. Defendant objects to the requests insofar as they seek information and/or the identification of documents that are neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

11. Defendant objects to the requests to the extent they seek information and/or the identification of documents that are so remote from the subject matter of this litigation and of such limited probative value or likelihood of leading to the discovery of admissible evidence as to make the production of such information and documents unreasonably burdensome, oppressive, and harassing.

12. Defendant's responses are based on information presently known or reasonably believed by Defendant at the time Defendant responds to the Notice to Produce. Defendant expressly reserves the right to supplement these responses, and to rely on additional information and/or documentation as it is uncovered through discovery or otherwise.

13. Defendant objects to the requests to the extent they are vague, ambiguous, overly broad, or that responding to them is burdensome, expensive, or oppressive.

#### **DOCUMENTS AND TANGIBLE THINGS REQUESTED**

1. All documents identifying or referencing any operators and vehicles (including the vehicle make, model, and description; registered owner; and registration information) operating

on the Lyft platform within 100 feet of the intersection of Marin Blvd. and 6th Street/Thomas Gangemi Drive in Jersey City, NJ on July 7, 2018 between 1:30 and 3:00 a.m.

**RESPONSE: Objection. Lyft objects to this demand to the extent that it is overly broad, unduly burdensome, oppressive, and harassing.**

2. All communications between defendant and any operators and/or vehicles operating on the Lyft platform within 100 feet of the intersection of Marin Blvd. and 6th Street/Thomas Gangemi Drive in Jersey City, NJ on July 7, 2018 between 1:30 and 3:00 a.m.

**RESPONSE: Objection. Lyft objects to this demand to the extent that it is overly broad, unduly burdensome, oppressive, and harassing.**

3. All driver logs for any operators and/or vehicles operating on the Lyft platform within 100 feet of the intersection of Marin Blvd. and 6th Street/Thomas Gangemi Drive in Jersey City, NJ on July 7, 2018 between 1:30 and 3:00 a.m.

**RESPONSE: Objection. Lyft objects to this demand to the extent that it is overly broad, unduly burdensome, oppressive, and harassing.**

4. All records showing log-in and log-off times for any operators and/or vehicles operating on the Lyft platform within 100 feet of the intersection of Marin Blvd. and 6th Street/Thomas Gangemi Drive in Jersey City, NJ on July 7, 2018 between 1:30 and 3:00 a.m.

**RESPONSE: Objection. Lyft objects to this demand to the extent that it is overly broad, unduly burdensome, oppressive, and harassing.**

5. All “forward dispatch” data, reports, summaries or other similar documentation created, stored or maintained in relation to any operators and/or vehicles operating on the Lyft platform within 100 feet of the intersection of Marin Blvd. and 6th Street/Thomas Gangemi Drive in Jersey City, NJ on July 7, 2018 between 1:30 and 3:00 a.m.

**RESPONSE: Objection. Lyft objects to this demand to the extent that it is overly broad, unduly burdensome, oppressive, and harassing.**

6. All activity recorded for any operators and/or vehicles operating on the Lyft platform within 100 feet of the intersection of Marin Blvd. and 6th Street/Thomas Gangemi Drive in Jersey City, NJ on July 7, 2018 between 1:30 and 3:00 a.m.

**RESPONSE: Objection. Lyft objects to this demand to the extent that it is overly broad, unduly burdensome, oppressive, and harassing.**

7. All records regarding the locations any operators and/or vehicles operating on the Lyft platform within 100 feet of the intersection of Marin Blvd. and 6th Street/Thomas Gangemi Drive in Jersey City, NJ on July 7, 2018 between 1:30 and 3:00 a.m.

**RESPONSE**: Objection. Lyft objects to this demand to the extent that it is overly broad, unduly burdensome, oppressive, and harassing.

8. A copy of policies and procedures concerning tracking of drivers operating on the Lyft platform.

**RESPONSE**: Objection. Lyft objects to this demand to the extent that it is overly broad, unduly burdensome, oppressive, and harassing. Without waiving these objections, see CRINCOLI-LYFT-000001 TO CRINCOLI-LYFT-000030.

DATED: April 25, 2022

**CRUSER, MITCHELL, NOVITZ,  
SANCHEZ, GASTON & ZIMET, LLP**  
*Attorneys for Defendant, Lyft, Inc.*

/s/ Douglas V. Sanchez  
By: Douglas V. Sanchez (DS1565)  
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# **EXHIBIT C**



## RUDOLPH, KAYAL & ALMEIDA

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\* Also admitted in NY  
+ Also admitted in PA

November 30, 2022

Direct e-mail: [malmeida@rudolphkayal.com](mailto:malmeida@rudolphkayal.com)

Christopher Cerullo, Esq.  
Cruser, Mitchell, Novitz, Sanchez, Gaston & Zimet, LLP  
Mack Cali Corporate Center  
50 Tice Boulevard, Suite 250  
Woodcliff Lake, NJ 07677

RE: Crincoli v. GEICO  
Docket No: 2:20-cv-3380  
Our File: 60219

Dear Mr. Cerullo:

In lieu of a more formal notice to produce, please provide responsive answers to our prior notice to produce specifically, responses to numbers 1 through 8, wherein you did not provide any data or other documentation other than the Lyft terms of service document and driver addendum. As discussed at the settlement conference with Judge Almonte, these answers were non-responsive and therefore, we request that you provide responsive answers and copies of all documents or data supporting the responsive answers. I am including my original request for documents below.

1. All documents identifying or referencing any operators and vehicles (including the vehicle make, model, and description; registered owner; and registration information) operating on the Lyft platform within ½ mile of the intersection of Marin Blvd. and 6<sup>th</sup> Street/Thomas Gangemi Drive in Jersey City, NJ on July 7, 2018 between 1:30 and 3:00 a.m.
2. All communications between defendant and any operators and/or vehicles operating on the Lyft platform within ½ mile of the intersection of Marin Blvd. and 6<sup>th</sup> Street/Thomas Gangemi Drive in Jersey City, NJ on July 7, 2018 between 1:30 and 3:00 a.m.
3. All driver logs for any operators and/or vehicles operating on the Lyft platform within ½ mile of the intersection of Marin Blvd. and 6<sup>th</sup> Street/Thomas Gangemi Drive in Jersey City, NJ on July 7, 2018 between 1:30 and 3:00 a.m.

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Page 2

4. All records showing log-in and log-off times for any operators and/or vehicles operating on the Lyft platform within ½ mile of the intersection of Marin Blvd. and 6<sup>th</sup> Street/Thomas Gangemi Drive in Jersey City, NJ on July 7, 2018 between 1:30 and 3:00 a.m.
5. All “forward dispatch” data, reports, summaries or other similar documentation created, stored or maintained in relation to any operators and/or vehicles operating on the Lyft platform within ½ mile of the intersection of Marin Blvd. and 6<sup>th</sup> Street/Thomas Gangemi Drive in Jersey City, NJ on July 7, 2018 between 1:30 and 3:00 a.m.
6. All activity recorded for any operators and/or vehicles operating on the Lyft platform within ½ mile of the intersection of Marin Blvd. and 6<sup>th</sup> Street/Thomas Gangemi Drive in Jersey City, NJ on July 7, 2018 between 1:30 and 3:00 a.m.
7. All records regarding the locations any operators and/or vehicles operating on the Lyft platform within ½ mile of the intersection of Marin Blvd. and 6<sup>th</sup> Street/Thomas Gangemi Drive in Jersey City, NJ on July 7, 2018 between 1:30 and 3:00 a.m.
8. A copy of policies and procedures concerning tracking of drivers operating on the Lyft platform.

Very truly yours,

MANUEL J. ALMEIDA JR., ESQ.  
MJA/cjk  
Enc.

cc: Susi K. Yanez, Esq.  
Sarabraj S. Thapar, Esq.



# **EXHIBIT D**



## RUDOLPH, KAYAL & ALMEIDA

COUNSELORS AT LAW, P.A.



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**MANUEL J. ALMEIDA, JR. \***  
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**RUSSEL V. MANCINO**

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+ Also admitted in PA

February 2, 2023

Direct e-mail: [malmeida@rudolphkayal.com](mailto:malmeida@rudolphkayal.com)

Christopher Cerullo, Esq.  
Cruser, Mitchell, Novitz, Sanchez, Gaston & Zimet, LLP  
Mack Cali Corporate Center  
50 Tice Boulevard, Suite 250  
Woodcliff Lake, NJ 07677

RE: Crincoli v. GEICO  
Docket No: 2:20-cv-3380  
Our File: 60219

Dear Mr. Cerullo:

In lieu of a more formal notice to produce, please provide the following:

1. All documents identifying or referencing any operators and vehicles (including the vehicle make, model, and description; registered owner; and registration information) operating on the Lyft platform within 100 feet of the intersection of Marin Blvd. and 6<sup>th</sup> Street/Thomas Gangemi Drive in Jersey City, NJ on July 7, 2018 between 1:30 and 3:00 a.m. This request is limited to vehicles that include one or more of the following descriptors: a New York license plate; a Nissan vehicle; a Toyota vehicle; a light colored, beige, or silver vehicle; a vehicle with "TL" in the license plate.
2. All communications between defendant and any operators and/or vehicles operating on the Lyft platform within 100 feet of the intersection of Marin Blvd. and 6<sup>th</sup> Street/Thomas Gangemi Drive in Jersey City, NJ on July 7, 2018 between 1:30 and 3:00 a.m. This request is limited to vehicles that include one or more of the following descriptors: a New York license plate; a Nissan vehicle; a Toyota vehicle; a light colored, beige, or silver vehicle; a vehicle with "TL" in the license plate.

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8. A copy of policies and procedures concerning tracking of drivers operating on the Lyft platform.

Very truly yours,

MANUEL J. ALMEIDA JR., ESQ.  
MJA/pb  
Enc.  
cc: Sarabraj S. Thapar, Esq.

# **EXHIBIT E**

CARS

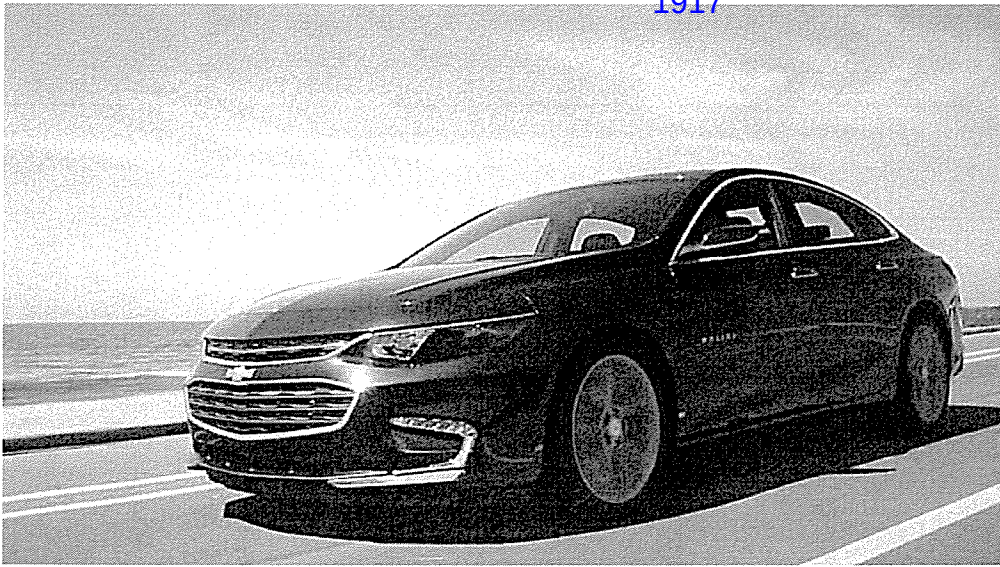
## 20 Cars Similar to the Toyota Camry

By Benjamin Smith   Posted on August 15, 2022



The Toyota Camry has quite a lot going for it. It's a midsize sedan with plenty of legroom and a surprisingly large amount of room to haul items in the trunk, despite the fact that it doesn't necessarily look that way when you look at the exterior. While there isn't anything particularly exciting about driving the Toyota Camry, the car is well known for its exceptional reliability. Most Camry owners have no problem getting where they want to go and these cars have a tendency to last for 200,000 or even 300,000 miles, provided you take care of them. That being said, the Camry isn't for everyone. If you want something that's similar, but you're really not interested in the Camry itself, you're in luck. Here are 20 cars that are similar to the Toyota Camry.





**Table of Contents** [ show ]

## 20. Chevrolet Malibu

There are several things about the Chevrolet Malibu that make it similar to the Toyota Camry. Even its appearance is relatively similar. If you're wondering how the two compare, you'll quickly find that there are a number of trim options offered by Chevrolet. This is quite similar to the different options offered by Toyota. As a matter of fact, the company offers gasoline powered Malibu's with four different trim options and a fifth option that is a hybrid.

The standard equipment is also similar, not the least of which includes basics like keyless entry and a movable steering wheel. There's also a basic safety package that includes halogen headlights and power mirrors. The car even comes with a sound system that has no less than six speakers strategically placed throughout. In case you're wondering, the car is also more economical than the Toyota Camry, costing roughly \$2,000 less at \$21,000.



## 19. Honda Accord

In many ways, the Accord is similar to the Camry. For starters, there are several different power trains that you can choose from, depending on the trim model that you want to purchase. The base model is definitely low on power, with a 1.5 L engine that only offers 192 horsepower. However, you can graduate all the way up to 252 horsepower. In addition, the car comes with a full complement of safety features including all of the latest road sensing technology. It's also comparably priced to the Camry, coming in at just over \$23,000.



## 18. Mazda Mazda6

This is a car that's full of surprises. It gets similar gas mileage to the Camry, roughly 36 miles to the gallon. However, it actually outperforms the Camry in several areas, not the least of which includes horsepower and towing capacity. At 272 horsepower, the car is capable of towing up to 3,500 pounds. Compared to the 1,000 pound towing capacity of the Camry, that's astonishing. The car can comfortably seat five people and has a number of luxury features that are not offered by Toyota. Surprisingly, the car is just over \$21,000, making it cheaper than the Camry as well.





## 17. Hyundai Sonata

This car is similar to the Camry in the sense that it gets similar gas mileage, about 38 miles per gallon. It's also cheaper than the Camry, coming in at just over \$21,000. If you're looking at the base model, it comes with a 2.0 L engine that's capable of easily outperforming the 1.5 L base model offered by Toyota. That being said, this is a car that oddly doesn't come with standard safety features. That means that you'll have to shell out an additional \$1,000 in order to get them.



## 16. Kia Optima

Kia has long been known as a car company that's capable of producing cars with a lot of features without the big price tag. This one is no exception. There are several trim options available, starting with a base model engine that offers 178 horsepower. On the other end of the spectrum, the tricked out model has 245 horsepower and still only costs a little more than \$30,000. By the way, that particular model also comes with all the safety features, Apple Carplay, a seven-inch infotainment display and six-speaker sound system. Just to top things off, it also features interior lighting using LED lights. In short, you end up driving a car that feels like it costs a lot more than its purchase price.



## 15. Chrysler 200



This car seems to have everything. You can spend less money and choose the base model with an engine that features 184 horsepower or you can go to the next level and purchase the V6 engine that offers a whopping 295 horsepower and a towing capacity of 3,600 pounds. The car is actually roomier than the Toyota Camry and has all of the safety features that you could ever imagine. However, there is one caveat. The car isn't available in the United States, at least not if you want to purchase one brand new. It hasn't been available in the States since 2017. However, it still is widely produced in other countries.



#### 14. Ford Fusion

This is the car that many people consider all inclusive because of the many different trim levels available. The base model doesn't have a lot of extras but you can purchase one for just over \$21,000. Even then, it's still comparable to the Camry in some ways. However, if you have the money to spend, you can go all the way up to the Platinum level for a little more than \$36,000. That gives you a full complement of safety and infotainment features along with a leather steering wheel, fully adjustable captain's chair seats that are both heated and cooled, and a 12- speaker sound system.





### 13. Subaru Legacy

Subaru's aren't typically known for being economically priced and this one comes in at just over \$31,000. However, it might be worth it. In many ways it's comparable to the Camry, but it tends to kick things up to the next level. You can comfortably seat anywhere from five to 10 people, depending on whether you choose the sedan or the SUV. You also get a car that is fully capable of performing well while still allowing you to feel like you're riding in style. That includes all the safety features Subaru is known for as well as front and rear seats that are both heated and cooled, leather accessories, a full infotainment system and a comprehensive sound system.



### 12. Toyota Avalon

This is like the luxury version of the Camry. It has front seats that are trimmed in leather which come fully heated as well as a leather trimmed steering wheel. All in all, it has a beefier suspension system, a more comprehensive sound system and offers a slightly more comfortable ride. If you want these extra amenities, you'll have to pay more money, as the car is roughly \$12,000 more than the Camry.



## 11. Kia K5

The Kia K5 has been compared to the Camry on a number of occasions, if someone were to make the Camry feel slightly more like a sports car. It offers 295 horsepower with a GT model and it comes standard with 17-inch wheels and a comprehensive traction control system that helps you keep power where it needs to be, no matter what type of road conditions you're facing. Of course, it also comes complete with a full complement of safety features and an updated interior that makes you feel like you're driving a luxury sports car instead of a car that costs less than \$30,000. Despite its outstanding performance, it still gets good gas mileage at 28 miles per gallon.



## 10. Nissan Altima

The Altima is often considered a very basic automobile. Much like the Camry, the base model doesn't offer a lot in the way of horsepower or extra features, but there are several trim options available that make the car more appealing. One of those trim options includes all wheel drive. There's even a version with a turbocharged engine. However, most experts will tell you that both of these options are more expensive than they're worth. Overall, the Nissan Altima offers a decent ride and basic safety features at a comparable price to the Camry. Choosing the elevated trim options adds a lot to the cost, but doesn't necessarily give you a lot in return.





## 9. Volkswagen Passat

This is a good basic car for anyone that's looking for something similar to a Camry at a similar price. It starts at \$27,000 and if you choose the most expensive trim option, it adds another \$3,000. There are also several different engine options available starting with a 4-cylinder that offers a modest 174 horsepower. That being said, even the base model is capable of going from 0 to 60 in less than nine seconds, not bad for a sedan that you're probably using to pick up groceries.



## 8. Toyota Corolla

The Toyota Corolla is the cleaner, less expensive sibling of the Camry. It's similar in appearance and in some cases, it's even similar in performance. However, it doesn't come with all of the upgraded luxury features that the Camry does. If you get the S model, it's much more like the Camry. On the other hand, the base model, or LE, is about as bare-bones as you can get. That being said, you're getting a reliable car that's capable of decent performance for anywhere from \$4,000 to \$6,000 less than you'll pay for the base model Camry. The four-cylinder engine is a bit uninspiring, but unless you plan on street racing your vehicle, it will do just fine.



## 7. Nissan Maxima

The newest Nissan Maxima has a starting price of just over \$37,000. Before you decide to walk away, consider these facts. It also has a 3.5 L, 300 horsepower V6 engine. In short, you're looking at what amounts to a sports car that's built like a sedan. This car has all of the safety features plus all the newest technology and it offers a comfortable ride that's very much like the Camry, only with better performance.



## 6. Honda Civic

The Civic looks small, but don't let that dissuade you from at least giving it a chance. It's actually got a lot more room than it looks like it does and despite the fact that it doesn't offer the greatest amount of horsepower, its performance is respectable. The base model only offers 154 horsepower and even the upgraded trim option comes in at 174 horses. However, the car is responsive and surprisingly comfortable to drive. It's also more affordable than the Camry. Even the more expensive version costs less than the base model Camry.





## 5. Chrysler 300

This sedan is much larger than some of the others on the list, and it even has slightly more room than the Camry itself. It can comfortably seat five adults but the big difference is in the engine. With this vehicle, you get a 295 horsepower V6 that's capable of towing decent-sized objects and outperforming most of the other cars on this list. Surprisingly, you get all of that for just a little more than \$24,000.

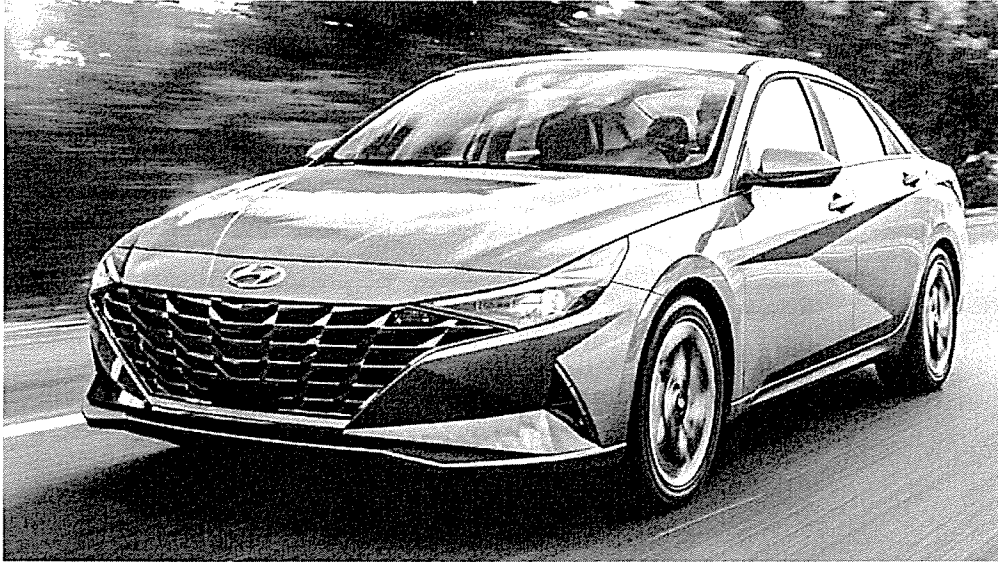


## 4. Lexus ES350

This is probably what a Camry would look like if it were a luxury car. It's got all of the safety features as well as a number of luxury features that simply aren't available on other cars. It also comes complete with a 302 horsepower V6 engine that gives it more than enough power to comfortably merge in even the heaviest of traffic. Like many of the other cars on this list, it comes with Apple Carplay, a front collision-warning system and lane-assist systems that make driving a lot safer than it used to be. If you want to drive something similar



to a Camry but you're looking for a little more in the way of luxury and style, this is it.



### 3. Hyundai Elantra

The base model Hyundai Elantra has almost all of the same safety features as a Toyota Camry and its gas mileage is almost identical. As a matter of fact, the two cars perform quite similarly when they're new. However, the Elantra doesn't have the Camry's reliability. If you're looking for something that costs less than a Camry, you can get this car brand new for just over \$16,000. That easily makes it one of the most affordable new cars available.



### 2. Honda Insight

The car can be purchased as a standard or a hybrid and is loads of fun to to drive. That being said, it doesn't have much room in the back, nor is there any appreciable trunk room. Despite these faults, it's surprisingly good on horsepower and it gets truly phenomenal gas mileage at 55 mpg. It has adjustable seats in the front and a basic infotainment package that can be integrated with your smartphone. The base price for the car is \$26,000.

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## 1. Acura TLX

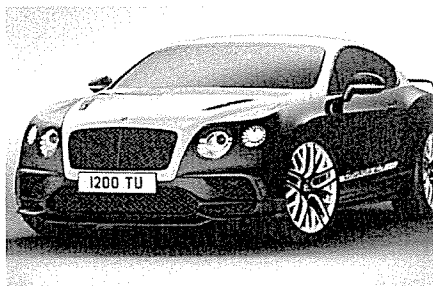
The first thing you'll notice about this car is that it looks amazing. Thanks to a smart front grille and an aerodynamic design, it's truly something to behold. It was designed to be a luxury sedan but it drives like it's a sports car. It also comes complete with all the features you'd expect on any luxury sedan, including a turbocharged engine and high-class interior. Starting around \$41,000, this car allows luxury without coming with a prohibitively expensive price tag.



### Benjamin Smith

Benjamin Smith is one of the managing editors of Moneyinc. Ben's been focusing on the auto and motorcycle sector since 2005. He's written over 1000 articles in the space and continues to learn about it each day. His favorite car is "any Bugatti" and he's a die hard Harley Davidson fan.

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# **EXHIBIT F**



# 18 Cars Similar to Nissan Maxima

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## MAXIMA



Nissan's flagship has long been the sportiest of Asian front-wheel-drive sedans. It is not a bad idea **if you want a Nissan Maxima**. The Nissan Maxima doesn't frequently stand out enough to be noticed and appreciated that it merits.

It is powered by a 3.5-liter V6 that's won so many awards. It's pretty luxurious by any standards. In short, it's a great car.

Many cars offer similar style and features as Nissan Maxima, majorly including Nissan Altima, Mazda's sleek six sedans, Honda Accord, Toyota Camry, Hyundai Sonata, Infiniti Q50, Volkswagen Arteon, Kia K5, Kia Cadenza, Toyota Avalon, Mercedes-Benz C300, and more.

Nissan Maxima is unquestionably the ideal choice out there; however, if it isn't appropriate for you, different models are available. To help you with tracking down the perfect choice to meet your requirements, we have created a list of 10 cars similar to Nissan Maxima.

**Contents** [ Show ]

## 1. Nissan Altima



The 2021 Nissan Altima is a medium-sized five-seat family vehicle that costs about \$25,000 in its base adaptation. It's an immediate opponent to probably the top-rated vehicles in the U.S., including the Toyota Camry, Honda Accord, and Hyundai Sonata.

Altima actually accompanies a fresh, attractive body. Upgraded for the 2019 model year, the most recent Altima looks more streamlined and more athletic than it has before, similar to its pursued hot yoga class, realizing lockdown was coming.

The hood's keener, the nose has a more profound V-formed grille, and the body has really chiseling. Less fat, leaner—and the allure extends into the essentially spread out lodge, which doesn't exactly coordinate with the outside's energy, yet puts the controls (counting a scramble mounted touchscreen) where they're effectively seen and utilized.

Most Altimas have a 188-torque inline-4 and a ceaseless factor transmission that social affair absents a lot of sparkles, similar to a Tinder date that will not get a second. Efficiency's out of this world at 39 mpg parkway, yet the powertrain can ramble and doesn't foster speed that rapidly.

The 248-hp super four on the choices list presently comes just with the Altima SR, and it's seriously holding—however, its stiffer suspension tune and absence of discretionary all-wheel drive send us back to the Altima SV as our suggested pick.

With 15 cubic feet of trunk space and the interior for no less than four 6-foot-tall travelers, the Altima doesn't leave a lot of space for objection. Seat solace is acceptable, as are leg and headroom—and regardless of whether freight space



can't coordinate with a Murano hybrid, it's still enough for a long weekend outing to anyplace open via vehicle.

## 2. Buick LaCrosse



Beginning at \$29,570, the Buick LaCrosse offers a considerable amount of significant worth for the cash. With the standard suspension, LaCrosse has the sort of ride that you'd anticipate from a Buick, however, with a considerably more fascinating outside. Outfitted with the versatile suspension, it turns into a significantly more amusing to-drive vehicle.

Power comes either from a 2.5-liter four-chamber with eAssist (a gentle crossover framework) matched with a 6-speed program that is useful for 29 mpg joined, or a 310-hp 3.6-liter V6 with a 9-speed program evaluated at 24



mpg consolidated (or 23 mpg in AWD trim). The interior is pleasant, and the materials are excellent.

### 3. Chevrolet Impala



The Chevrolet Impala is one of the deals on the list, with a beginning cost of \$27,895. For that cash, you get an enormous and agreeable vehicle controlled by a 197-hp 2.5-liter four-chamber and a 6-speed programmed transmission rated at 25 mpg combined.

A substantially more spritely 305-hp V6 is accessible for an additional \$1,095 on base models, again matched with a 6-speed programmed for a mileage rating of 22 mpg. Impala offers a peaceful inside with genuinely pleasant materials, a decent ride, a lot of inside room, and an enormous trunk.



## 4. Chrysler 300

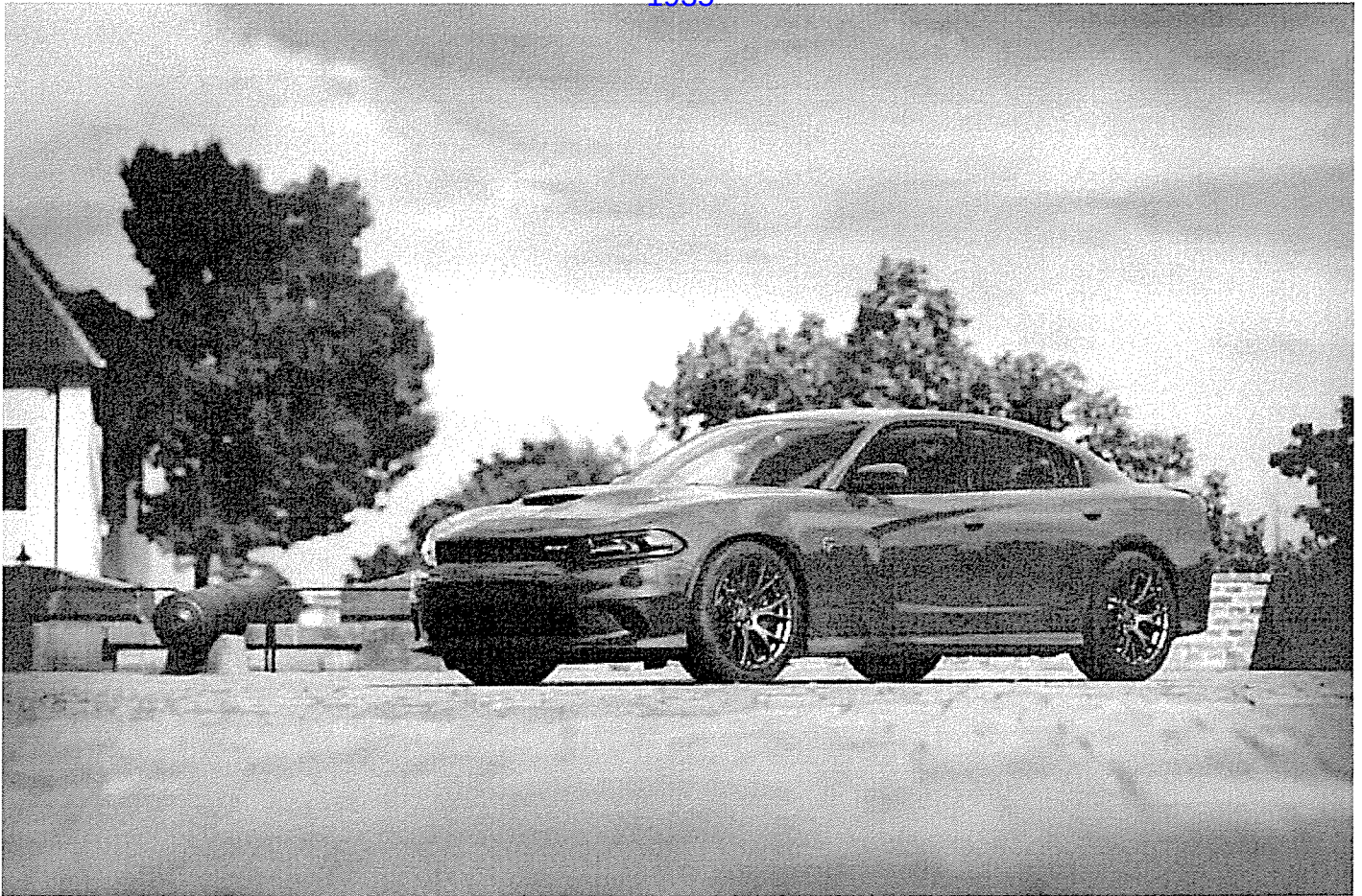


The Chrysler 300 figures out how to undermine the Maxima with a beginning cost of \$28,995 for a 292-hp V6 model; however, a Hemi V8 model with 363 hp will hamper you \$40,995. Both utilize an 8-speed programmed transmission with joined efficiency of 23 mpg for the V6 and 19 mpg for the back tire drive-just V8.

Taking care of isn't exactly satisfied with the best luxury sedans cars. The inside quality isn't exactly up to the principles set by different vehicles on our rundown; however, the 300 has a comfortable interior with a lot of room for a nice ride.

## 5. Dodge Charger





The Dodge Charger comes in a large number of renditions, going from \$28,995 SXT V6 to \$35,495 R/T V8, and surprisingly the \$67,995 Hellcat with its 707-hp supercharged V8. All models utilize an 8-speed program, and mileage goes from a best of 23 mpg consolidated (for the back tire drive V6) to a most noticeably awful of 16 mpg (typically for the Hellcat).

All Chargers are somewhat short on extravagance, and the material quality isn't so excellent as a portion of different vehicles on our rundown. Then again, you do get the brilliant uConnect theater setup (with everything except the base models getting an 8.4-inch screen) and one of the last remnants of American muscle.

**The Dodge Charger is a fantastic option in contrast to the Nissan Maxima.** Presently, there's no way to avoid it. While the Nissan Maxima might come



driven by a 300-hp 3.5-liter V6, it's in no way, shape, or form a presentation vehicle.

## 6. Genesis G80



The Genesis G80 is a smidgen more costly than the Maxima, with a beginning cost of \$41,750, but on the other hand, it's more lavish than anything even a first-in-class Maxima can offer. Base models accompany a 311-hp 3.8-liter supported by an 8-speed program.

However, a 365-hp turbocharged 3.3-liter V6 and a 420-hp 5.0-liter V8 likewise are accessible. Efficiency goes from 22 mpg consolidated for a back tire drive V6 to 18 mpg joined for an all-wheel-drive V8.



The ride is brilliant (and taking care of respectable), and the inside is up to extravagance vehicle principles with pleasant materials and heaps of cutting edge highlights. The Genesis offers the total bundle at a surprisingly decent cost.

## 7. Honda Accord



Since it's a medium-sized car, the Honda Accord is somewhat more modest (and slightly less rich) than the Maxima, however with a beginning cost of just \$23,570, it's a clear deal on our rundown. It is agreeable and offers a very sizable amount of space for most families with a genuinely enormous back seat.

Power comes either from a 192-hp turbocharged 1.5-liter four-chamber presenting to 33 mpg consolidated, or a 252-hp turbocharged 2.0-liter four-



chamber with 27 mpg joined (and a 47 mpg mixture likewise is accessible). If it's large enough for you, the Accord will make a brilliant option in contrast to the Nissan Maxima.

**The Honda Accord is a medium-size option in contrast to the Nissan Maxima.** Let's assume you don't require a standard car. In case that is the situation, consider looking at the current year's new Honda Accord.

Similar to the Maxima, the current year's Accord acquired some lovely excellent grades from Consumer Reports. While customer Reports gave the Maxima an 81 general score, it gave the Honda Accord an 84 by and significant score.

## 8. Lexus ES





Redesigned for 2019, Lexus ES is a front-wheel-drive extravagance vehicle with a beginning cost of \$39,500. Power comes either from a 302-hp 3.5-liter V6 upheld by an 8-speed programmed transmission (useful for an expected 26 mpg joined) or a crossover powertrain with a 2.5-liter four-chamber and a continuously variable transmission.

The inside of the ES is exceptionally great with heaps of value materials, and the ride is agreeable and calm. Dealing with is adequately competent, yet not energetic; assuming you need something somewhat more amusing to drive, the comparatively measured back tire drive Lexus GS offers more execution; however, at a marginally higher cost.

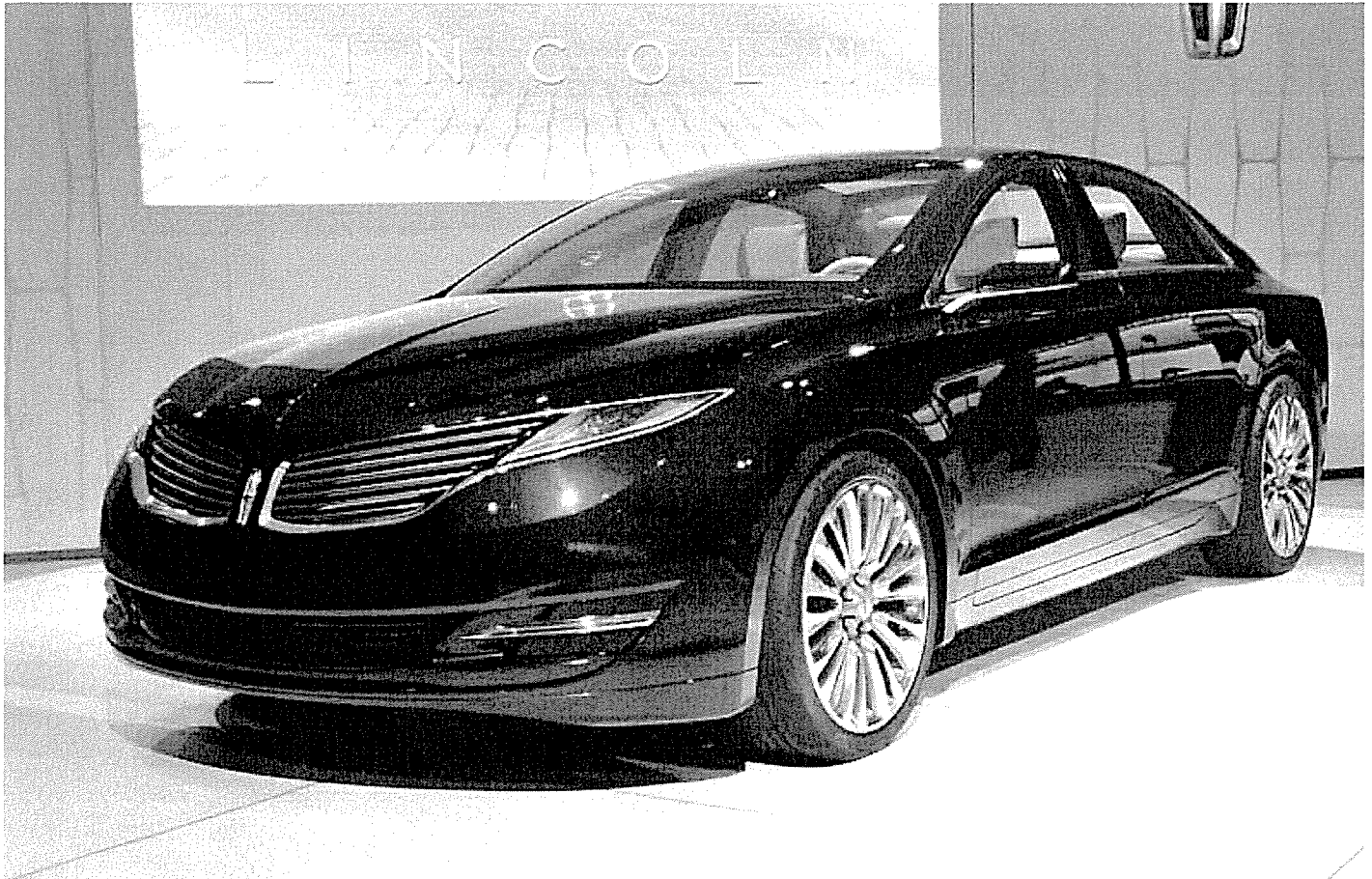
## 9. Kia Cadenza





At \$32,290, the Kia Cadenza emphasizes extravagance with an inside that utilizes pleasant materials (particularly on better quality adaptations). The 3.3-liter V6 created 290 hp and joined with the 8-speed programmed transmission; it's useful for a consolidated mileage rating of 23 mpg.

## 10. Lincoln MKZ



Beginning at \$35,605, the Lincoln MKZ offers an alluring outside, a pleasant enough inside, and many techs. Yet, the champion element is the accessible turbocharged 3.0-liter V6 that creates a noteworthy 400 hp in all-wheel-drive design. The MKZ gives a lot of grasps.

Those searching for a more agreeable ride should settle on the more section-level form with its 2.0-liter four-chamber motor that makes 245 hp and is



useful for 24 mpg joined (or 23 mpg in AWD trim), or the 188-hp half breed adaptation with its 40 mpg consolidated rating.

## 11. Toyota Avalon



With a beginning cost of \$35,500, the new-for-2019 Toyota Avalon offers a somewhat more rich interpretation of the regular car than the Nissan Maxima. Yet, it actually may astonish you with how rapidly it speeds up (in V6 structure).

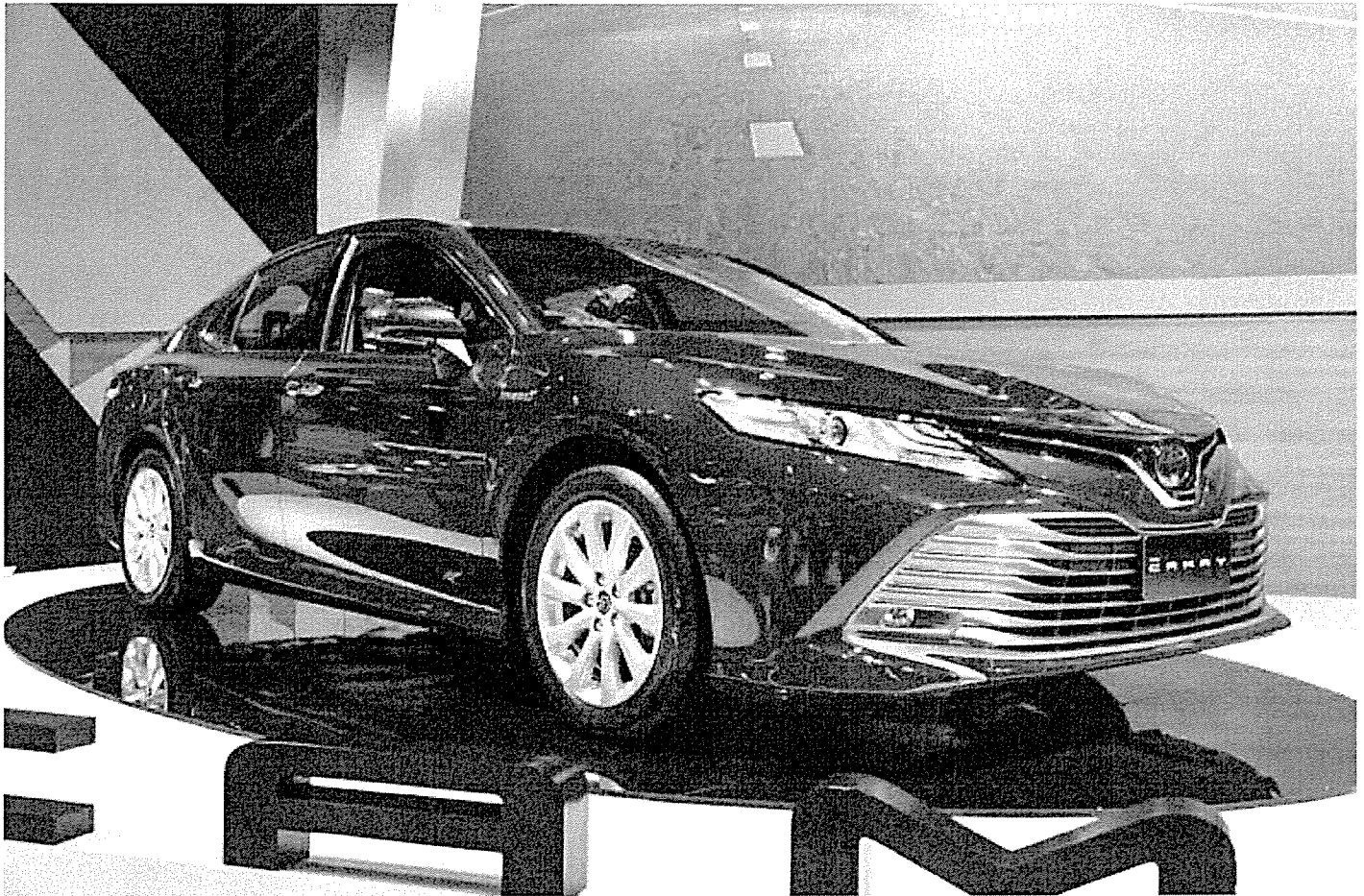
Power comes either from a 301-hp 3.5-liter V6 upheld by an 8-speed automatic transmission (a combo useful for 24 mpg joined) or by a half and half powertrain with 215 hp (yet a surprising 40 mpg consolidated efficiency rating).

It gives a smooth ride and is prominently peaceful inside. The interior has a wonderful plan, is comfortable and usable, and everything you touch looks and



feels superior grade.

## 12. Toyota's Camry



If you need something somewhat cushier, the vast majority believe Toyota's Camry is Maxima's direct competition; however, it truly isn't. For all Toyota's as of late reckless styling, the Camry stays a standard family car, not some Japanese BMW wannabe.

It's milder in the suspension, less pleased in its inward burning, and less informative in its directing criticism. Indeed, it is sportier than it has been, yet nobody should confuse it with a 3 Series.

All things considered, the Camry is currently an alluring monster, both outside — which, as I said, is somewhat more unmistakable in requesting consideration



— and inside, where a splendid red inside is only what to persuade maturing Boomers that they stay as au courante as anyone might think possible.

It's nearly pretty much as large as the Maxima, as extravagant in its specific manner, and, by most assessments, the most solid vehicle on earth. I have put relatives and significant companions of the family into Camrys, a high proposal for sure, thinking about how open they would be tied in with grumbling if I directed them wrong.

## 13. Mercedes-Benz C300



If you've all set to go German, the conspicuous decision is the Mercedes-Benz C300, which, apparently, is way cooler than the Maxima, not on the grounds that it sports a clearer hood trimming, yet in addition since it truly is an



appealing monster. On the off chance that section-level luxury vehicles truly were sold on looks alone, the Merc would be one of a kind.

Unfortunately, different parts of the C300 are not o stellar. The base four-chamber turbocharged motor, while providing a yeoman 255 pull and 273 lb.-ft. of force, is just not quite so captivating as Maxima's social butterfly V6. Goodness, it flaunts a touch more snort down low, yet that tightens as things begin getting fun.

It is also contrasted and Maxima's rorty V6; the 2.0L sounds all around bombastic. Nor does the inside, in spite of a new invigorate, feel as elaborate. It looks work to a cost; the very same pejorative European extravagance vehicle proprietors used to heave at Japanese competitors.

## **14. Infiniti Q50**



**If you need a much sportier and richer Nissan item,** perhaps you ought to mosey on over to Infiniti and shop the Q50. Fueled by a turbocharged 3.0L V6, the Infiniti variant is even growlier than the Maxima, and despite the fact that it siphons out a similar 300 drive as the Maxima, its 295 lb.- ft. of force is lustier and accessible sooner.

All the more significantly, in case you're willing to burn through \$56,195 — simply more than \$10,000 more than \$45,650 Maxima Platinum requests — there's a "Red Sport" adaptation of the Q50 accessible with a twin-super V6, siphoning out a BMW M4-testing 400 ponies and 350 lb.- ft. of force.

It's a stonker of an engine and simply what to amaze cheeky BMW, Mercedes-Benz, and Audi drivers. The all-wheel-drive Q50 likewise turns unequivocally



strongly, with fantastic criticism through the controlling haggle body roll, particularly in topline Red Sport appearance.

The inside is likewise lovely upscale, however other than in the infotainment office; it doesn't actually outmatch the Maxima, given it as of now fights at a surprisingly high level. At the end of the day, get it for the identification, the suspension, or that best-in-class engine, yet don't imagine the Maxima isn't in its group.

## 15. Volkswagen Arteon



With the Arteon, VW redesigns a Passat-sized vehicle with more force, and with super-advanced elements, for example, a computerized instrument bunch and a rubbing driver's seat as the arrangement moves from SE to SEL and SEL Premium trim levels.

The Arteon replaces the sluggish selling VW CC and plugs an opening in the automaker's setup that presumably didn't should be filled. Essentially it's pretty, with a vast grille, a dapper rooftop line, and a spunky tail that is really a hatchback, not an ordinary trunk.

Inside, the Arteon has a perfect, practical put that is the best self forward with the cowhide upholstery and wood-style trim found in SEL manages. Like every other vehicle in VW's arrangement, the Arteon is fueled by a 2.0-liter super 4.

Here, it's matched to an 8-speed programmed transmission, and its 268 pull and 258 pound-feet of force go to either the front of every one of the four wheels.

The Arteon speeds up energetically; however, its ride is delicate in the vast majority of its versatile suspension modes. It handles adroitly, however, with the vast majority of its character sifted through of its thick-rimmed directing wheel. With all-wheel drive, it's just possibly more eco-friendly than some hybrid SUVs, be that as it may.

Inside, the new Arteon has an agreeable, extensive inside that can deal with four travelers, and the low roofline doesn't cut a lot into the back headroom; however, the entryway openings are small. As a hatchback, the Arteon has surprisingly great freight utility. Crease its back seats, and it'll swallow 55 cubic feet of gear, which isn't too distant from a few SUVs.

## **16. Hyundai Sonata**

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The 2021 Hyundai Sonata banks on fewer rivals, including Nissan Maxima, competing for buyers of mid-size sedans. The way it's chosen to surface in the still-congested group: dramatic flair, along with lots of features and value.

With the Sonata, Hyundai's shaped a silhouette with luxury overtones, crafted a cabin with the same, and stocked it all with some of the best warranty coverage and standard gear of any family four-door. With its graceful new interior, the Sonata has banished drab to other brands.

Hyundai compiles a certain lightness from very slim air vents and climate controls and flanks that on Limiteds with twin digital displays with explosive graphics that indicate changes in drive modes. The wing-like dash blends upgraded materials on Limiteds to a luxury-car effect, and the car's piano-key climate switches make perfect sense.

Base cars get plainer and more forgettable—the quilted seats in the Limited are just one moment of peripheral beauty in a cabin that bristles with them.

## 17. MAZDA6



The 2021 Mazda 6 four-door sedan slots in as the Japanese automaker's mass-market sedan. It's a rival for the Nissan Maxima, Camry, the Accord, the Sonata, and other cars that only need one name to stand out on the sales charts.

No matter which trims you choose—Sport, Touring, Grand Touring, Grand Touring Reserve, or Signature—the 2021 Mazda 6 is among the most handsome sedans on the road.

The wide but slim grille and headlights, the gently curved body, and the tall rear end cut a sharp and sleek profile, while the cockpit's composed from simple but elegant shapes and dressed in fine materials, especially on the Signature edition.



Mazda fits a 187-horsepower 2.5-liter inline-4 in base six sedans and teams it with a 6-speed automatic to deliver tepid acceleration, with more noise than we're used to from its refined cars.

Strap on a turbo, and the 227-hp six lives up to its sporty promise better, with strong power in most situations that suits the nimble handling and firm but absorbent ride-tuned into its chassis. The 6 lacks all-wheel drive but doesn't lack for it.

Interior comfort gets a high pass for the front passengers, but the 6 has slimmer headspace for rear-seat passengers and a trunk that's slightly smaller than most in its class.

Crash-test scores have been nearly perfect, and the six comes with automatic emergency braking as well as an 8.0-inch touchscreen for infotainment that's also saddled with a fuzzy control knob that we mostly ignore in favor of taps and steering-wheel commands.

## **18. Kia K5**



The 2021 K5 is longer, lower, and more extensive than the vehicle it replaces and will be accessible with an all-wheel drive. Controlled by a 180-hp 1.6-liter super four or a 290-hp super 4, it's an alarm, connect with an ally for family drivers enchanted too by its solid guarantee inclusion and worth. It's sold in LX, LXS, GT-Line, EX, and GT variants.

All offer a more tense, more honed style than Kia's active Optima. The K5 has profoundly etched sides, a falcon-like nose organized by LED lighting, and a long band of metallic trim that takes off along a roofline that is dropped the visual party stunt of passed out trim that gave the Optima a "gliding" rooftop.

Inside the K5's more elegant renditions, open-pore wood and engineered calfskin upholstery pull off the business-class look of the Telluride and Stinger, while GT-Line models and those beneath have all the more hard plain trim.

The K5's an excited entertainer, speedy enough behind the 180 pull created by its 1.6-liter super 4. 8-speed programmed works in the show to clip off downshifts and stay behind the scenes where it should be. The K5 GT model adds a 290-hp 2.5-liter super 4 in with the general mish-mash and offers a major jump in execution.

The all-wheel drive's a choice on essentially every model—as are 18-inch wheels, which add some bang to the K5's low-speed ride while its guiding burdens up with a weight that does more to keep it following valid than it does to convey controlling sensations.

Longer in wheelbase, the K5 has more front-seat space to go with expanded front-seat cans. Four grown-ups fit effectively, with space for a thin fifth and 16 cubic feet of freight in the storage compartment.

Each 2021 K5 gets programmed crisis slowing down, touchscreen infotainment with Apple CarPlay and Android Auto similarity, and five years or 60,000 miles of guarantee inclusion.

## **References:**

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Driving: [Alternatives to Nissan Maxima](#)

The Car Connection: [Nissan Maxima Choices](#)

Car Gurus: [Nissan Maxima vs. Infiniti Q50](#)

The Car Connection: [Hyundai Sonata](#)